

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)**

In re:
BLOCKFI INC., et al.¹,

Debtors.

BLOCKFI INC. AS THE WIND DOWN
DEBTORS,

Plaintiff,

v.

ACE AMERICAN INSURANCE COMPANY,
ARCH INSURANCE COMPANY, AXIS
INSURANCE COMPANY, BERKLEY
INSURANCE COMPANY, BERKSHIRE
HATHAWAY SPECIALTY INSURANCE
COMPANY, ENDURANCE AMERICAN
SPECIALTY INSURANCE COMPANY,
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA, U.S.
SPECIALTY INSURANCE COMPANY, XL
SPECIALTY INSURANCE COMPANY,

Defendants.

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered under a
Confirmed Plan)

Adv. Proc. No. 24-01067 (MBK)

**DECLARATION OF KEVIN J. WINDELS, ESQ. IN
SUPPORT OF APPLICATION TO BE ADMITTED PRO HAC VICE**

I, KEVIN J. WINDELS, ESQ., of full age, hereby declare under penalty of
perjury as follows:

¹ The Wind-Down Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

1. I am an attorney at law in the State of New York and a Partner with the law firm of Kaufman Dolowich, LLP, counsel for defendant, Endurance American Specialty Insurance Company (“Endurance”).

2. I submit this Declaration in support of Endurance’s Application to Admit Counsel *Pro Hac Vice*, seeking my admission to practice as such before this Court, pursuant to Local Civil Rule 101.1(c), D.N.J. LBR 9010-1 and D.N.J. LBR 2090-1, to represent Endurance in the above-captioned matter.

3. As shown in the attached Certificate of Good Standing, I am a member in good standing of the Bar of the State of New York. I am also admitted to the practice before the United States Supreme Court, the United States Court of Appeals for the Second Circuit and the United States District Courts for the Northern, Southern, Eastern and Western Districts of New York.

4. There are no disciplinary proceedings pending against me in any jurisdiction. I have never been disciplined by any bar in any jurisdiction.

5. The year of admission and the name and address of the official or office maintaining the roll of such members of the bars in which I am a member in good standing are as follows:

COURT	DATE OF ADMISSION	ADDRESS
New York State Bar	1985, Bar No. 2004521	45 Monroe Place, Brooklyn, NY 11201

U.S. District Court for the Northern District of New York	2009	James M. Hanley Federal Building, 100 South Clinton Street, PO Box 7367, Syracuse, NY 13261-7367
U.S. District Court for the Southern District of New York	1985	500 Pearl Street, New York, NY 10007
U.S. District Court for the Eastern District of New York	1985	225 Cadman Plaza East, Brooklyn, NY 11201
U.S. District Court for the Western District of New York	2004	2 Niagara Square, Buffalo, NY 14202
U.S. Court of Appeals for the Second Circuit	1993	Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007
U. S. Supreme Court	1995	One First Street, N.E. Washington, D.C. 20453

6. I am a partner of Seth D. Griep, Esq. of Kaufman Dolowich, LLP, who is counsel of record for defendant, Endurance. Mr. Griep is admitted to practice in New Jersey and is a member in good standing of the Bar of this Court.

7. I have an ongoing client relationship with Endurance.

8. Based on my ongoing representation of Endurance and based on the specific request of Endurance that I be permitted to appear *pro hac vice* on its behalf in this matter, I request that I be admitted *pro hac vice* in this action.

9. With respect to matters arising in connection with this case, I acknowledge that I am subject to the disciplinary jurisdiction of this Court.

10. I shall adhere to the Rules governing the United States District Court for the District of New Jersey, including Local Civil Rules 101.1(c), 103.1 and 104.1, and Rules 1:20-1(b) and 1:28-2 of the New Jersey Court Rules, during my period of admission.

11. I acknowledge that pursuant to Local Civil Rule 101.1(c) and D.N.J. LBR 9010-1(b)(4), only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations and receive payments on judgments, decrees or orders.

12. I further agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial or other proceedings. further agree to submit to the jurisdiction of the Court for purposes of sanctions, discipline, or such other actions as the Court may deem proper.

13. An admission fee of \$250 will be paid to the Clerk of the United States District Court for the District of New Jersey for my admission, and as required by New Jersey Court Rule 1:28-2(a), payment will be forwarded to the New Jersey Lawyer's Fund for Client Protection upon my admission *pro hac vice*.

14. There are no pending disciplinary proceedings against me in any jurisdiction and I have never been disciplined by any bar in any jurisdiction.

15. I have not been convicted of a felony.

16. I have not been censured, suspended, disbarred or denied admission or readmission by any court.

17. I acknowledge that I may not withdraw as counsel without leave of this Court before the action is terminated.

18. **WHEREFORE**, I respectfully request that this Court grant the proposed order submitted herewith and permit me to appear as counsel *pro hac vice* in this matter on behalf of Endurance.

I hereby declare that the foregoing statements made by me are true. I am aware that if the foregoing statements made by me are willfully false, that I am subject to punishment pursuant to 28 U.S.C. § 1746.

Dated: March 7, 2024

Respectfully submitted,

By: /s/Kevin J. Windels
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